

**Bufete**

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January 5, 2019

By Email

Martin Bienenstock  
Proskauer Rose, L.L.P.  
Eleven Times Square  
New York, NY 10036-8299

**First request for documents and information: Re: Objection of PROSOL-UTIER to COFINA Plan of Adjustment [Case No. 17-3284, Docket Entry No. 380]**

Dear Mr. Bienenstock:

As you know, we represent PROSOL-UTIER in a contested matter governed by Federal Rule of Bankruptcy Procedure 9014, grounded in the motion opposing the confirmation of the COFINA's Plan of Adjustment of Debt ("Motion"). With that purpose, we disclosed in a report the expert testimony of Dr. José Israel Alameda-Lozada. In addition, we submitted with the Motion Dr. Alameda's curriculum vitae and a statement under penalty of perjury about the circumstances of the report and its reliability.

In accordance with the procedures required by the Bankruptcy Code and the applicable PROMESA provisions, particularly Section 314, the FOMB has the burden to demonstrate that the COFINA Plan of Adjustment is confirmable. Therefore, before requesting the Court's intervention in protection of PROSOL-UTIER's due process rights, we make this extrajudicial effort for request of information in order to be fully prepared for the confirmation hearing that is scheduled for January 16 and 17. Given the short period of time available for this matter, we request that the documents and information are provided by January 9, 2019 before 5 P.M. AST.

The documents and information that we request at this moment to be delivered to us are the following:

1. Full name, address, telephone number, email and curriculum vitae of the expert or experts who will testify in the confirmation hearing.
2. All the necessary information based upon for issuing the opinion or testimony; for example, but with no limitation, the working papers for the opinion or testimony, bibliographical sources, the methodology used and the specific conclusions that will be part of the expert's testimony in court as required by Federal Rule of Evidence 702 and the relevant case law. The documents and information should be produced even though the FOMB's determines that it will not be submitting them as evidence in the hearing. Documents should be submitted in searchable PDF format.

Martin Bienenstock  
January 5, 2019

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3. Duplicates of all the documents that will be submitted as evidence on the day of the hearing in searchable PDF format.

Cordially,

A handwritten signature in black ink, appearing to read 'Rolando Emmanuelli Jiménez', with a long, sweeping horizontal line extending to the right.

Rolando Emmanuelli Jiménez, Esq.

Cc:

Jessica E. Méndez Colberg, Esq.  
Hermann Bauer, Esq.